

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CCC INTELLIGENT SOLUTIONS INC.,)
)
Plaintiff,) Case No. 1:18-cv-07246
)
v.)
) Hon. LaShonda A. Hunt
TRACTABLE INC.,) Hon. Keri L. Holleb Hotaling
)
Defendant.)

**JOINT MOTION TO EXTEND STAY OF DISCOVERY
AND EXTEND CLOSE OF FACT DISCOVERY**

Plaintiff CCC Intelligent Solutions Inc. (“CCC”) and Defendant Tractable Inc. (“Tractable”) (collectively, the “Parties”) respectfully move the Court to extend the current stay of discovery to January 31, 2024, and to extend the close of fact discovery to April 30, 2024. In support of this motion, the Parties state as follows:

1. On October 2, 2023, the Parties filed a joint motion to stay and extend fact discovery while they continue settlement negotiations and thus to avoid the costs and burdens of unnecessary litigation. Dkt. No. 157.

2. On October 3, 2023, the Court granted this joint motion, stayed fact discovery until November 3, 2023; extended the close of fact discovery to January 31, 2024; and instructed the Parties to file a joint status update on February 1, 2024. Dkt. 158.

3. The Parties have made significant progress negotiating potential settlement during this time and are making arrangements to participate in a mediation to resolve the remaining issues. Given scheduling issues and the limited availability of their chosen mediator, such mediation is likely going to occur in January. The Parties desire to further minimize the costs and burdens of litigation at least through completion of this mediation.

4. Accordingly, the Parties have conferred and agreed, subject to the Court's approval, to extend the stay of discovery to January 31, 2024, and to extend the close of fact discovery (should it be needed) to April 30, 2024.

5. The requested stay will not prejudice either party and will serve the interests of judicial efficiency and conservation of resources. Without such an extension, the Parties instead would expend significant resources taking depositions in multiple U.S. states and internationally, attempting to resolve discovery disputes or submit them to the Court for resolution, and producing and reviewing further materials. Accordingly, to preserve the Parties' and the Court's resources, and in furtherance of the potential resolution of this matter, the Parties submit that there is good cause to issue the requested stay and extension.

6. NOW, THEREFORE, by and through undersigned counsel, the Parties respectfully request that this Court grant the joint motion to extend the stay of discovery to January 31, 2024, and to extend the close of fact discovery to April 30, 2024.

Dated: November 2, 2023

/s/ Matthew W. Walch

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Respectfully submitted,

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